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To: IPGA Members Regarding: Graduated Licensing Program	From: John Tibbs Date: March 19, 2003

The US Department of Transportation is exploring a Graduated Licensing Program for CDL's. If you feel that you have any information you would like to contribute on this issue, review the following questions and submit your comments no later than May 27, 2003 to:

Dockets Management System (DMS)
 US Department of Transportation
 Room Plaza-401
 400 Seventh Street, SW
 Washington DC 20590-001

FMCSA-2002-12334-18

Make sure you include the docket number FMCSA-2002-12334 at the beginning of your comments.

Remember this potential rulemaking could impact your hiring practices for future drivers

Please organize and identify your comments by question number. General comments on the GCDL concept and areas that you believe were not addressed in the questionnaire are also welcome.

Information About You

1. Please indicate your primary occupation(s) from the following list:

Truck driver	Motor carrier insurance provider
Owner-operator	Risk assessment specialist
Motor coach/bus driver	Labor union representative
Fleet manager/owner	Public interest group
Company safety director	Enforcement officer (motor carrier safety)
Transit system administrator	Motor vehicle administrator (state driver's licenses)
Commercial driver trainer	Other
Motor carrier insurance provider	

2. Do you think a graduated commercial driver's license (GCDL) is needed?

Regardless of your response to question number 2, please complete the rest of the questions so that we will know your preferences if a GCDL were to be pilot tested or implemented nationally.

No

Training

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

No

4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

No

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

1 MONTH

Driving Record

6. Should an applicant's past driving record be considered in issuing a GCDL?

YES

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Driving Record (cont.)

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an applicant to be denied a GCDL?

- Passenger car or light truck motor vehicle accidents ☒ Controlled substances convictions
Traffic violations and citations ☒ Reckless driving convictions
☒ DUI/DWI convictions ☐ Other convictions for motor vehicle traffic control violations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those drivers with an unrestricted CDL?

NO

Driving Experience

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

1-MONTH

Restrictions

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- ☒ Reduced hours of service
☒ Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.)
Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.)
Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving)
Limitations on geography or terrain features (e.g., mountains)
Limitations on distance or types of highways (e.g., miles per day, interstate highways, etc.)
Other

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

NO

Age

12. What is the minimum age at which an applicant should be eligible to receive a GCDL? 21

13. Assuming that training requirements are met, what is the minimum age at which the holder of a GCDL should be eligible to graduate to an unrestricted CDL?

21

Testing

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- ☒ Single test to "graduate" to an unrestricted CDL
Periodically while holding a GCDL UNTIL TRAINING IS COMPLETE
Initial test plus re-test at 1 year after receiving initial GCDL
Other

Other Factors

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

Costs

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

